

### 3. BONA FIDE REQUEST INITIATION

The key document in the Bona Fide Request process is the Bona Fide Request Form. A copy of the form is included at the end of this practice. The BFR Form provides Ameritech detailed and specific information about the service, capability, network element or interconnection option being requested and describes how the request qualifies as a network element or form of interconnection to be provided pursuant to the Telecommunications Act of 1996 or under another regulatory or statutory requirement. There are 14 data items associated with each request. They are:

- (a) Requester's name, address and contact information (BFR Form, Question 1);
- (b) Description of the service or network element being requested (BFR Form, Question 2);
- (c) Whether the request involves modification or combination of an existing service element or information about the service or facility being modified (BFR Form, Question 3);
- (d) Whether the requested item is available from another service element or from another source (BFR Form, Question 4);
- (e) Description of any desired special operational characteristics (BFR Form, Question 5);
- (f) Illustrations or drawings which help in understanding the request (BFR Form, Question 6);
- (g) Information concerning the expected service and/or location life of the requested capability (BFR Form, Question 7);
- (h) A non-disclosure statement regarding shared information (BFR Form, Question 8);
- (i) Locations and points of interconnection or access (cities, wire centers, etc.) by state where the capability is desired (BFR Form, Question 9);
- (j) Expected demand for the requested service (BFR Form, Question 10);
- (k) Pricing assumptions underlying the demand estimates (BFR Form, Question 11);
- (l) Any other information which the requester feels may facilitate evaluation and development (BFR Form, Question 12);
- (m) Classification information (BFR Form, Question 13);
- (n) Problems or issues needing resolution. Reason for obtaining feature or if cannot obtain, would it impair your ability to provide services (BFR Form, Question 14);
- (o) Selection of preliminary analysis cost payment option (BFR Form, Question 15).

Each of these items will facilitate processing of request for the development of a new or custom service, capability or new or modified network element or interconnection option. These items are similar to those that are requested by any firm in evaluating a request for a new or custom product. Moreover, this information provides the basis for a sound technical and economic analysis of the request -- an analysis which will support fact-based decision making.

#### **4. SUMMARY**

The process also benefits regulators by helping to minimize the need for arbitration and/or complaints by facilitating constructive negotiations. To the extent there are any such proceedings, the BFR process will provide regulators with a detailed record with regard to both the request and Ameritech's response which can form the basis for prompt and proper dispute resolution. The public will also benefit because the process promotes both the introduction of new interconnection capabilities and unbundled services while minimizing the costs incurred by Ameritech in responding to these types of requests.

**AMERITECH BONA FIDE REQUEST FORM**

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The information requested in this form is essential for our assessment of your request. This information will enable us to process your Bona Fide Request (BFR) and to perform a technical assessment of its feasibility. This BFR Form initiates the process Ameritech uses to evaluate requests for further unbundling or interconnection as provided for in the Telecommunications Act of 1996 or other applicable state or federal regulations.

Please complete the form in full, and submit via facsimile to the Ameritech Information Industry Services (AIIS) Bona Fide Request Manager at 810-483-3738. If you desire to contact the BFR Manager directly he or she can be reached at 810-443-9900. The Bona Fide Request Manager will be your single point of contact within Ameritech concerning your request. The representative is responsible for tracking and coordinating your request and will, at a minimum, send the following to you:

1. Written confirmation of receipt of the request (normally within 10 business days).
2. Written status when the initial technical feasibility analysis is completed (normally within 30 calendar days) and request for authorization to proceed.
3. Written notification concerning the final disposition of the request (normally within 90 calendar days of receipt of your authorization to proceed).

The above schedule is subject to modification based upon the specific requirement of each agreement and each state. Should you have any further questions regarding this application or the process or the Bona Fide Request process please feel free to contact the BFR Manager at the number shown above.

**AMERITECH BONA FIDE REQUEST FORM**

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1) Requested By

\_\_\_\_\_  
(Company Name)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
(Contact Person)

\_\_\_\_\_  
(Facsimile Number)

\_\_\_\_\_  
(Phone Number)

\_\_\_\_\_  
(Date of Request)

\_\_\_\_\_  
(Optional: E-Mail Address)

2) Description of the network interconnection capability, function, system, element or feature or combination requested (use additional sheets of paper to describe the requested service, if necessary):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

#### **4. SUMMARY**

The process also benefits regulators by helping to minimize the need for arbitration and/or complaints by facilitating constructive negotiations. To the extent there are any such proceedings, the BFR process will provide regulators with a detailed record with regard to both the request and Ameritech's response which can form the basis for prompt and proper dispute resolution. The public will also benefit because the process promotes both the introduction of new interconnection capabilities and unbundled services while minimizing the costs incurred by Ameritech in responding to these types of requests.

**AMERITECH BONA FIDE REQUEST FORM**

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**AMERITECH BONA FIDE REQUEST FORM**

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**1) Requested By**

\_\_\_\_\_  
(Company Name)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
(Contact Person)

\_\_\_\_\_  
(Facsimile Number)

\_\_\_\_\_  
(Phone Number)

\_\_\_\_\_  
(Date of Request)

\_\_\_\_\_  
(Optional: E-Mail Address)

**2) Description of the network interconnection capability, function, system, element or feature or combination requested (use additional sheets of paper to describe the requested service, if necessary):**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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**AMERITECH BONA FIDE REQUEST FORM**

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- 3) Is this a request for a modification or combination of existing services or network elements? If so, please explain the modification or combination and describe the existing services or elements(s) or indicate its name.

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- 4) Is this a service or network element available from any other source or a service or network element already offered by Ameritech? If yes, please provide source's name and the name of the service or network element.

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- 5) Is there anything custom or specific about the manner that you would like this feature, function or combination to operate?

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- 6) If possible, please include a drawing or illustration of how you would like the request to operate and interact with the network.

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- 7) Please describe the expected location life, if applicable, of this capability (i.e., period of time you will use it). Do you view this as a temporary or long range arrangement?

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AMERITECH BONA FIDE REQUEST FORM

- 8) If you wish to submit this information on a non-disclosure basis, please indicate this here. If non-disclosure is requested, either attach a prepared Ameritech non-disclosure agreement, or request one to be sent to you for completion or identify an existing agreement that covers this transaction, and properly identify any information you consider confidential.

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- 9) Where do you want this capability deployed?

A) State (Check one state)\*

- ☐ Illinois  
☐ Indiana  
☐ Michigan  
☐ Ohio  
☐ Wisconsin

\* Since separate agreement and rules apply in each state, a separate BFR Form, and if applicable, deposit is required for each state for which you wish to have Ameritech process the BFR.

B) Major metropolitan area(s), in the state included above. (Please list area name):

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C) Specific wire centers (use a separate document if necessary) or other points of interconnection or access where this capability is desired:

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## AMERITECH BONA FIDE REQUEST FORM

- 10) What is the expected demand of each location, e.g., estimated number of customers, subscriber lines, number of units to be ordered?

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Location	Estimate of demand/units
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

- 11) What are your pricing assumptions? In order to potentially obtain lower non-recurring or recurring charges you may specify quantity and/or term commitments you are willing to make. Please provide any price/quantity forecast indicating one or more desired pricing points (use additional sheets if necessary).

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- 12) Please include any other information that could be of assistance to Ameritech in the evaluation of this service request:

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AMERITECH BONA FIDE REQUEST FORM

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13) Please classify the nature of your request (Check one).

☐

Request for interconnection

☐

Request for a new network element

☐

Request for a combination of network elements

☐

Request for a Physical Collocation where there is no space available for either physical or virtual collocation in the requested Ameritech Central Office.

☐

Request for enhanced service capability under the Open Network Architecture (ONA) program.

☐

New service or capability that does not fit into any of the above categories.

14) What problem or issue do you wish to solve? Why is it necessary for you to obtain this feature or if it were unavailable, how would it impair your ability to provide your services?

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15) Preliminary analysis cost payment option (Check one).

☐

\$2,000 deposit per state included with request under the understanding that my responsibility for Ameritech's costs shall not exceed this deposit for the preliminary analysis during the first 30 days.

☐

No deposit is made and (Requesting Carrier Name) agrees to pay Ameritech's total preliminary analysis costs incurred until I cancel the request.

**AMERITECH BONA FIDE REQUEST FORM**

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By submitting this request, except as provided, we agree to promptly compensate Ameritech for any costs it incurs in processing this request, including costs of analyzing, developing, provisioning, or pricing the request, until the Ameritech BFR Manager receives our written cancellation. We also agree to compensate Ameritech for such costs in accordance with its practice, if we fail to authorize Ameritech to proceed with development within 30 days of receipt of the 30-day notification, or we fail to order the service within 30 days, in accordance with the final product quotation. We certify that a copy of the practice is available to us.

\_\_\_\_\_  
by: \_\_\_\_\_  
its: \_\_\_\_\_





AT&T Corporate Center  
227 West Monroe  
Chicago, IL 60606

January 16, 1997

Ms. Joanne Missig  
Manager-BFR Process  
Ameritech Information Industry Services  
Southfield, Michigan

Via FAX

**RE: AT&T's Bona Fide Request for Routing OS/DA Traffic**

Dear Ms. Missig:

This is in response to your January 14, 1997 letter regarding AT&T's Bona Fide Request to determine the technical feasibility of routing AT&T's Central Region customers' OS/DA traffic to its Platforms. First, the timeframe proposed in your letter to process the BFR does not conform to either the language in the Ameritech Practice or the language contained in the interconnection agreements.

According to the Ameritech Practice, one-hundred twenty days may be allowed to process a Bona Fide Request. However, the time schedule which you have provided allows Ameritech approximately 131 days. According to our records, Ameritech received AT&T's payment on December 27, 1996. Under Ameritech's own guidelines, it must finalize the BFR process by no later than April 27, 1996. Furthermore, within thirty (30) calendar days of the initial request (December 27, 1996) and sooner if at all possible, AT&T expects to receive the complete "30-day formal response" regarding the technical feasibility of this BFR (see page 2 of Ameritech's Practice for details).

Second, in your January 14, 1996 letter, Ameritech states that the time clock began on your "receipt of the completed request on January 7, 1997, i.e. when [Ameritech] received enough information to allow Ameritech to proceed in processing [AT&T's] request..." This statement seems highly subjective. For example, your response letter received on January 2, 1996 to AT&T stated that AT&T's request was not a BFR even though AT&T's transmittal letter clearly stated that it was submitting a BFR for processing. Certainly we made every effort to complete your BFR Form with the information that you requested.

AT&T also seeks clarification regarding the required payment for the preliminary processing of a Bona Fide Request. As you have noted in your latest letter, AT&T and Ameritech now, or shortly will have, five separate interconnection agreements in the Central Region. In accordance with those agreements the \$2000 payment will no longer be required to process a BFR pursuant to Schedule 2.2 of the interconnection agreements. AT&T acknowledges that this BFR was initially submitted prior to the execution of the interconnection agreement, and consequently our \$2000 check was prepared pursuant to the Practice. AT&T asks Ameritech to proceed to process the BFR from December 27, 1996 for the five states while keeping the \$2000 payment which limits AT&T's liability on the preliminary evaluation costs. However, Ameritech's authority for requiring a \$2000 payment is not apparent to AT&T in either the Practice or the interconnection agreements. Your explanation is necessary prior to AT&T submitting any further payment.

AT&T expects that the BFR covering all five states will continue to be processed in a timely manner. AT&T eagerly awaits your reply.

Very truly yours,

  
Eddy Cardella

Cc: Susan Bryant-AT&T  
Jane Medlin-AT&T  
Bonnie Hemphill-Ameritech







AT&T

# FACSIMILE MESSAGE COVER SHEET

Corporate Center  
227 W. Monroe  
Chicago, IL 60606



FOLLOWING THIS COVER SHEET IS/ARE 3 PAGE(S)

TO:

Name: Jaanne Missig

Room #: \_\_\_\_\_

City: \_\_\_\_\_

Phone #: 810-443-9900

Fax #: 810-483-3738

FROM:

Name: Eddy Cardella

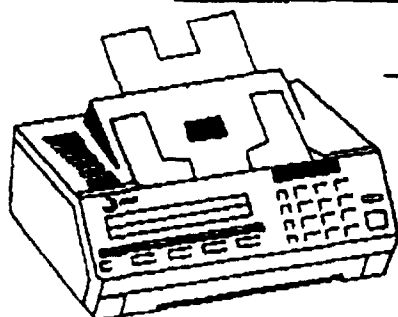
Room #: 205H11

City: Chicago, IL 60606

Phone #: 312-230-6264

Fax #: 312-230-8305

COMMENTS \_\_\_\_\_



( ) Hand Deliver Urgent

( ) Call for Pick-Up

AT&T anticipates that Ameritech will provide us with information according to the timeframes set forth in the executed interconnection agreements in Illinois, Michigan and Wisconsin. The information requested in Indiana and Ohio will be in accordance with the Ameritech Practice. Thank you for your immediate attention.

Very truly yours,

A handwritten signature in cursive script that reads "Eddy Cardella".

Eddy Cardella

Cc: Susan Bryant-AT&T  
Jane Medlin-AT&T  
Bonnie Hemphill-Ameritech

In reference to the clarification you provided regarding a deposit for this Bona Fide Request, AT&T continues to believe that a deposit is not applicable under both the Telecommunications Act of 1996 ("Act") and our interconnection agreement. Under the Act, Ameritech is obligated to provide the routing of OS/DA traffic to the CLEC's platforms.<sup>1</sup> Therefore, AT&T should not be responsible to pay Ameritech costs to determine whether or not it can comply with its obligations under the Act. In the event that capacity limitations in some offices may require construction or upgrading of the switch software, AT&T does not anticipate making a separate payment to Ameritech given the FCC's position stated in the First Report and Order and the state commission pricing orders. Ameritech should recover its costs through a competitively neutral method to be determined by the state public utility commission.

Moreover, regarding Schedule 2.2 of our interconnection agreement, AT&T does not understand Ameritech's interpretation. Generally, Schedule 2.2 says that AT&T should not pay Ameritech for its analysis of the Bona Fide Request in a separate payment unless AT&T cancels the BFR and the payment does not fall into one of the two categories discussed in Section 3 of Schedule 2.2. As indicated in our previous letter dated January 16, 1997, AT&T requests further clarification of Ameritech's interpretation of Schedule 2.2 of the interconnection agreement.

In any event, per our discussion on Friday, February 14th, AT&T requests Ameritech to proceed with the processing of this BFR in order to prevent any further delays in the timely implementation of routing AT&T's customers' OS/DA traffic. Therefore, to move forward without waiving any of AT&T's rights, including seeking a refund, I will provide you with an \$8000.00 check, under separate cover. The check will ensure that Ameritech continues to process this BFR for all five states in the Ameritech region.

For reasons previously stated, AT&T still does not understand Ameritech's authority for imposing either a charge for processing this BFR or a charge for the construction or upgrading Ameritech's network. Therefore, AT&T will not agree to your request for AT&T to pay additional payments, unless we receive clarification. However, our disagreement on this issue should neither prevent you from continuing to process this request, nor prevent AT&T from finalizing its business plans. We are starting to become concerned with your inability to provide us with the information because what we thought was a simple request may, in fact, delay our entry into the marketplace. Please follow up with me in the next few days in order to discuss these issues.

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<sup>1</sup> See Section 418 of the FCC's First Report and Order dated August 8, 1996.



AT&T Corporate Center  
227 West Monroe  
Chicago, Illinois 60606

February 17, 1997

Ms. Joanne Missig  
Manager-BFR Process  
Ameritech Information Industry Services  
23500 Northwestern  
Room A-106  
Southfield, Michigan

Via FAX

RE: AT&T's Bona Fide Request for Routing OS/DA Traffic

Dear Ms. Missig:

This is in response to your February 6, 1997 "preliminary analysis" letter regarding AT&T's Bona Fide Request to determine the technical feasibility of routing AT&T's Central Region customers' OS/DA traffic to its Platforms. This preliminary analysis does not specifically address AT&T's request in the manner we expected. Your letter only states that in the Ameritech region it is "...currently generally technically feasible from all of Ameritech's switches." The letter goes on further to state that within three weeks from the receipt of AT&T's authorization, "...Ameritech will provide a list of the end offices for which the OS/DA routing option for resale and/or unbundled local switching is not currently available." Based on the interconnection agreements, **AT&T had anticipated that Ameritech's 30-day analysis would provide specific information, by switch and by type, identifying where, if anywhere, it is determined to be technically infeasible to route the OS/DA traffic.** Additionally, AT&T also asked Ameritech to describe the differences, if any exist, in the routing of traffic in a resale environment as opposed to an environment where the Platform is provided without OS/DA as a standard offer. Providing the information in this manner is critical to AT&T's entrance in the local services market.





AT&T Corporate Center  
227 West Monroe  
Chicago, Illinois 60606

VIA FAX

May 2, 1997

Joanne Missig  
Manager- BFR Process  
Ameritech Information Industry Services  
23500 Northwestern Highway  
Room A106  
Chicago, IL 60606

Dear Ms. Missig:

I received your April 25<sup>th</sup> letter and appreciate the feedback regarding both your position on cost recovery for this BFR including the Summary Bill and the comments on the information provided in your analysis to date.

We look forward to your May 8<sup>th</sup> response containing the information regarding the limiting factors by switch. Our expectation is that you will provide all the supporting data and parameters for each switch where it was determined to be 'technically infeasible' to offer routing to AT&T's OS and DA platform (see AT&T's April 10<sup>th</sup> letter). This should include a description of whether it is (i) technically not feasible to provide alternative routing from a particular switch (including the basis on which the determination of technical infeasibility was made) or (ii) alternative routing is technically feasible, but the switch currently lacks capacity. If the latter situation exists, a discussion of Ameritech's plans for increasing capacity and the number of both available LCCs and reserved LCCs by switch should be included.

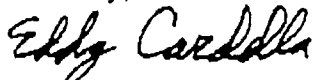
In order to evaluate the information furnished by you in response to our BFR, we need a description of the assumptions used by Ameritech to complete its analysis, including the basis for your determination of the number of LCCs required on each switch. The description of the LCCs that you anticipated AT&T would need will be very useful to AT&T in adjusting our business plans to provide service in those locations where you indicate routing is not currently available.

The Summary Bill also received on April 25<sup>th</sup> lacks sufficient detail for AT&T to process any payment. While Ameritech has referenced these charges in earlier correspondence, it has never provided any supporting detail to allow AT&T to review the charges to determine that they are 'reasonable and customary' and follow TELRIC pricing principles. Please indicate by state the supporting data (i.e. hourly rate, hours, resources utilized, etc.) that results in the bottom line Phase I and Phase II costs noted on the invoice.

With regard to other payment issues or cost recovery, AT&T has never stated that it would not "pay the applicable recurring and non-recurring costs of developing, installing, providing and maintaining the requested capability". We appear to have a fundamental difference as to when and how these costs are recovered. Even our interpretation of Section 3 of Schedule 2.2 of the Interconnection Agreement is different. Based upon the correspondence exchanged between our two companies and a meeting on April 17<sup>th</sup> on the BFR process, I believe we have identified an area of disagreement not only for this BFR but for interpretation and implementation of the process going forward. Given that, AT&T will provide a separate analysis or response regarding payment issues/cost recovery and would like to suggest a meeting/conference call to address this. Dependent upon the findings in that meeting, either party may pursue other avenues for resolution.

Notwithstanding the above, once AT&T receives the supplemental information described in this letter including the bill detail which provides the basis for the charges on the bill, AT&T will move forward with payment of appropriate fees for this BFR. This in no way prejudices our ability to address the BFR payment process issue in a separate meeting, as suggested above, as well as to seek resolution via other forums as needed, including seeking a refund of all or a portion of the charges in the future.

Sincerely,



Eddy Cardella







AT&T Corporate Center  
222 West Adams  
Chicago, Illinois 60606

December 24, 1996

Ms. Joann Missig  
Manager-BFR Process  
Ameritech Information Industry Services  
Southfield, MI

Via FAX & Fed Ex

RE: Bona Fide Request

Dear Ms. Missig:

Attached please find AT&T's Bona Fide Request ("BFR") regarding the technical feasibility of routing OS/DA traffic to AT&T in the Central Region. As indicated in the request, AT&T is seeking this information and will rely upon it to support future interconnection requests with Ameritech. AT&T seeks a response from Ameritech as soon as possible. Furthermore, AT&T expects the BFR process to begin on the date of this letter.

I look forward to working with you regarding AT&T's future business needs. Please refer all calls concerning this request to me at (312)230-6264. Thank you for your immediate cooperation.

Very truly yours,

*Eddy Cardella*  
Eddy Cardella

Cc: Susan Bryant  
Jane Medlin  
Bonnie Hemphill